## IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

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| Application Number | 09/883,300 | Confirmation No.: | 9721 |
| Appellant | Glen Boysko *et al.* | | |
| Filed | June 19, 2001 | | |
| Title | METHOD AND SYSTEM FOR SECURITY AND USER ACCOUNT INTEGRATION BY REPORTING SYSTEMS WITH REMOTE REPOSITORIES | | |
| TC/Art Unit | 2155 | | |
| Examiner: | Thu Ha Nguyen | | |
| Docket No. | 53470.003028 | | |
| Customer No. | **21967** | | |

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## REPLY BRIEF

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In response to the Examiner's Answer mailed September 4, 2008, maintaining the rejection asserted in the Final Office Action ("the Action") of pending claims 1-20, Appellants respectfully request that the Board of Patent Appeals and Interferences reconsider and reverse the rejections of record.

**I. Status Of Claims**

Claims 1-20 stand rejected under 35 U.S.C. § 102(e) as being allegedly anticipated by U.S. Patent No. 6,453,353 to Win *et al* ("Win").

The rejection of claims 1-20 is appealed.

**II. Grounds Of Rejection To Be Reviewed On Appeal**

The following grounds of rejection are to be reviewed on appeal:

The rejection of claims 1-20 under 35 U.S.C. § 102(e) as being allegedly anticipated by U.S. Patent No. 6,453,353 to Win *et al* ("Win").

**III. Argument**

The Office has failed to show that the claims are anticipated. Each of the specific claims and the impropriety of the rejections is addressed below.

**A. The Rejection Of Claims 1-20 Under 35 U.S.C. §102(e)**

The Examiner's Answer continues to repeat at least the following errors in this case:

- That Win teaches a "*remote* repository" when the access server 106, registry server 108, and the registry repository 110 are all in the same system 2;

- That Win teaches "the remote repository is located *within* a second server, the second server being different from the first server" when the figures and language of Win clearly show that it is "coupled;" and

- That Win teaches "determine user access control data for identifying a least one user privilege for *performing* one or more actions" when Win merely shows a role-specific access menu to a network user that is available to show only those resources.

In response to the Examiner's Answer, Appellants respectfully submit that Win makes no mention of a applying the authentication process against "a *remote* repository" and "wherein the remote repository is located *within* a second server, the second server being different from the first server" (emphasis added).

First, with regard to the "remote repository" limitation, Win appears to merely teach that resource and user information are organized in a "*central* repository." *See* Win at col. 5, lines 12-20 (emphasis added). In other words, Win's repository is central to system 2, not remote to system 2. This is clearly distinguishable from a remote repository that is not owned by the system, as claimed ("[a] method for integrating security and user account data in a reporting system with at least one remote repository"). It appears that the Examiner's Answer misconstrues Win and asserts that Win teaches a remote repository simply because "the access server 106 and registry server 108 are different" even though both servers are within the same system (e.g., system 2). *Examiner's Answer* at p. 11.

Second, with regard to the "repository is located within a second server" limitation, Appellants respectfully submit that Win makes no mention of a applying the authentication process "wherein the remote repository is located *within* a second *server*, the second server being different from the first server" (emphasis added). For example, even assuming that Win teaches a remote repository, Win clearly teaches that the repository is not "located within" the second *server*, as expressly recited in claim 1. Rather, the "Registry Server 108 is **coupled to** a

Registry Repository 110" (emphasis added). *See* Win at col. 6, lines 20-26. Although this argument has been previously presented to the Office, the Office, in its Examiner's Answer, has continued to deliberately misconstrue the Win reference without any explanation. For instance, the Examiner's Answer has clearly acknowledged this fact when it states that "[t]here is clearly shown the databases are *coupled* to the server;" however, the Office conveniently refers to Win as teaching a "registry repository 110 **at the** registry server 108" and "the remote repository is located **within** a second server" (emphasis added). *Examiner's Answer* at p. 11. This is clearly not what is explicitly shown in Win and therefore an improper application of the reference under section 102. Even though the Examiner's Answer asserts the "broadest reasonable interpretation" standard to justify its interpretation, to construe "Registry Server 108 is **coupled to** a Registry Repository 110" as "Registry Server 108 **at** a Registry Repository 110" and/or "Registry Server 108 is **located within** a Registry Repository 110" is clearly unreasonable and therefore improper.

In addition, not only does Win fail to teach a remote repository that is located within a second server, Win also fails to teach the step of determining user access control data for identifying at least one user privilege for performing one or more actions and at least one user permission associated with one or more objects. In fact, Win appears to merely teach a role-specific access *menu* to a network user that is *available to show only* those resources that the user is authorized to access according to the user's profile information, including roles and privileges. *Examiner's Answer* at p. 12 (citing Win, col. 5, line 66 - col. 6, line 17, "providing user a personalized menu that displays only resources that user has a right to access"). This is clearly distinguishable from access control data for identifying at least one user privilege for

*performing one or more actions* and at least one user permission associated with one or more objects.

As a result, the disclosure of Win fails to teach or show at least the limitation directed to "enabling the first server to apply the authentication process to authenticate the user against a remote repository for verifying the user credential input and *to determine user access control data for identifying at least one user privilege for performing one or more actions and at least one user permission associated with one or more objects, wherein the remote repository is located within a second server, the second server being different from the first server*," as expressly recited in claim 1.

Accordingly, for at least this reason, Win does not teach **each and every limitation** of claim 1 and the rejection of claim under 35 U.S.C. § 102(e) should be withdrawn.

Likewise, as acknowledged by the Examiner's Answer, independent claims 8 and 15 recite similar limitations as independent claim 1. Therefore, since independent claim 1 is allowable over Win for the reasons discussed above, the rejections of claims 8 and 15 should also be withdrawn. Dependent claims 2-7, 9-14, and 16-20 are also similarly rejected by Win. As a result, by virtue of their dependency on independent claim 1, 8, or 15, the rejections of dependent claims 2-7, 9-14, and 16-20 should also be withdrawn.

For at least the above reasons, Appellants respectfully request that the rejection of claims 1-20 be withdrawn and allowance thereof is respectfully requested.
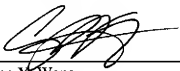
## IV.    Conclusion

Because the cited reference fails to disclose or render obvious all features set forth in the pending claims, Appellants submit that the pending claims are allowable over the cited reference. Accordingly, Appellants respectfully request that the Board reverse the prior art rejections set

forth in the Action, and allow all of the pending claims. Authorization is hereby granted to

charge or credit the undersigned's Deposit Account No. 50-0206 for any fees or overpayments

related to the entry of this Appeal.

Respectfully submitted,

Date: <u>November 4, 2008</u>      By:                               

George Y. Wang
Registration No. 58,637

For:   Brian M. Buroker
        Registration No. 39,125

Hunton & Williams
1900 K. St., NW, Suite 1200
Washington, D.C. 20006-1109
(202) 955-1500